

*McHale*  
*Arthur Song*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2405

FEB 14 1990

Ref 8HWM-FF

Mr Robert M Nelson, Jr , Manager  
Department of Energy  
Rocky Flats Area Office  
P O Box 928  
Golden, CO 80402-0928

RE Draft Phase II RI/FS  
Workplan (alluvial) for OU 2

Dear Mr Nelson

EPA has reviewed the December 21, 1989, draft Phase II RI/FS Workplan (alluvial) for Operable Unit 2 (OU 2) in advance of the requirements of the December 14, 1989 proposed Interagency Agreement (IAG). EPA's comments pertaining to this Workplan are attached as are the comments submitted by our contractor. EPA has accelerated its review of this Workplan in order to meet the date agreed to in the February 7, 1990, meeting. As agreed during the February 7, 1990, meeting, DOE must resubmit a revised Phase II RI/FS Workplan (alluvial) addressing EPA and CDH comments by April 12, 1990.

The agreement reached February 7, 1990 also allows expedited collection of characterization data necessary to produce an Interim Measure/Interim Remedial Action (IM/IRA) proposed decision document addressing contaminated groundwater at OU 2. The final Phase II RI/FS Workplan (alluvial) shall be modified to perform work in two steps. The first step shall be contaminant plume delineation, including investigation of bedrock units in direct hydrologic connection to the alluvium, as defined by alluvial drilling, as well as hydrologic testing. The second step of the Phase II alluvial investigation shall characterize the sources of contamination at OU 2. Completion of both steps of the Phase II investigation shall comprise a site characterization which is intended to completely define the nature and extent of contamination in the alluvium at OU 2. The final Phase II RI/FS Workplan (alluvial) shall include a schedule for completion of each step of the work and shall include a milestone date for which DOE shall present the results of the plume delineation and hydrologic testing.

As agreed, the submittal of the draft RFI/RI Report for OU 2 shall remain as August 21, 1990, as specified in the proposed IAG. DOE must also submit the draft RI/FS Workplan (bedrock) as specified in the proposed IAG, November 13, 1990.

ADMIN RECORD

A-OU02-000356

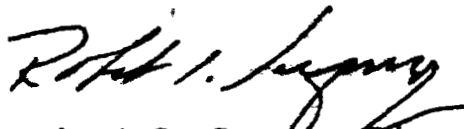
In reviewing this Workplan EPA believes that DOE has generally relied on poor quality phase I data. The phase II investigation must be carefully crafted to substantiate or refute conclusions derived from this poor quality data. DOE should also refer to EPA's comments concerning the Background Geochemical Characterization Report, submitted February 7, 1990.

During review of this Workplan, EPA discovered information which indicates DOE must initiate an IM/IRA to address surface water seeps presenting an imminent threat to both Woman and South Walnut Creeks. EPA is concerned that this data was not included in, and/or discussed during recent meetings pertaining to, the December, 1989, IM/IRA proposed decision document for OU 2. The IM/IRA proposed decision document for OU 2 should have addressed the surface water seeps which contain levels of volatile organics significantly above surface water standards

In addition to expediting the work necessary to characterize the groundwater affected by OU 2, as detailed above, EPA requests that DOE submit a draft IM/IRA plan to address the surface water seeps threatening both Woman and Walnut Creek by April 16, 1990. EPA requests this submittal in accordance with Part 3, Paragraph 15. A., Part 23, Paragraph 150., and in accordance with the requirements of paragraph I.B.10. of the Statement of Work of the IAG

EPA and CDH have discussed issues pertaining to the draft Phase II RI/FS Workplan, however CDH will be forwarding comments under a separate letterhead. EPA and CDH look forward to our next meeting, scheduled for February 27, 1990, to discuss these comments. If there appear to be inconsistencies between the State and EPA with regard to the comments on this Workplan, these inconsistencies can be addressed during the February 27, 1990 meeting. If you should have any questions prior to this meeting, please contact Martin Hestmark or Nathaniel Miullo of my staff at (303) 294-1132 and (303) 294-1134, respectively.

Sincerely,



Robert L. Duprey, Director  
Hazardous Waste Management Division

Attachment

cc Dave Shelton, CDH  
Peter Ornstein, SRC  
Patricia Corbetta, CDH